12-02-05

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HEWLETT-PACKARD COMPANY
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PATENT APPLICATION

ATTORNEY DOCKET NO. 100200074-1

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor(s): Nancy Cheung et al.

Confirmation No.: 6352

Application No.: 09/993,277

Examiner: D. Y. Eng

Filing Date: Nov. 5, 2001

Group Art Unit: 2155

Title: SYSTEM AND METHOD FOR ROUTING MESSAGES TO APPROPRIATE ONES OF GEOGRAPHICALLY DISTRIBUTED EMAIL SERVERS

Mail Stop Appeal Brief-Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450

TRANSMITTAL OF APPEAL BRIEF

Sir:

Transmitted herewith is the Appeal Brief in this application with respect to the Notice of Appeal filed on **Oct. 3, 2005**.

The fee for filing this Appeal Brief is (37 CFR 1.17(c)) $500.00.

(complete (a) or (b) as applicable)

The proceedings herein are for a patent application and the provisions of 37 CFR 1.136(a) apply.

( ) (a) Applicant petitions for an extension of time under 37 CFR 1.136 (fees: 37 CFR 1.17(a)-(d) for the total number of months checked below:

( )	one month	$120.00
( )	two months	$450.00
( )	three months	$1020.00
( )	four months	$1590.00

( ) The extension fee has already been filled in this application.

(X) (b) Applicant believes that no extension of time is required. However, this conditional petition is being made to provide for the possibility that applicant has inadvertently overlooked the need for a petition and fee for extension of time.

Please charge to Deposit Account **08-2025** the sum of **$500.00**. At any time during the pendency of this application, please charge any fees required or credit any over payment to Deposit Account 08-2025 pursuant to 37 CFR 1.25. Additionally please charge any fees to Deposit Account 08-2025 under 37 CFR 1.16 through 1.21 inclusive, and any other sections in Title 37 of the Code of Federal Regulations that may regulate fees. A duplicate copy of this sheet is enclosed.

(X) I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail, Label No. EV 482725795 US addressed to: Commissioner for Patents, Alexandria, VA 22313-1450
Date of Deposit: December 1, 2005

OR

( ) I hereby certify that this paper is being transmitted to the Patent and Trademark Office facsimile number_____ on _____

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Typed Name: Gail L. Miller

Signature: Gail L. Miller

Respectfully submitted,

Nancy Cheung et al.

By _____

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Docket No.: 100200074-1
(PATENT)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:
Nancy Cheung et al.

Application No.: 09/993,277 | Confirmation No.: 6352

Filed: November 5, 2001 | Art Unit: 2155

For: SYSTEM AND METHOD FOR ROUTING MESSAGES TO APPROPRIATE ONES OF GEOGRAPHICALLY DISTRIBUTED EMAIL SERVERS | Examiner: D. Y. Eng

APPEAL BRIEF

MS Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

As required under § 41.37(a), this brief is filed within two months of the Notice of Appeal filed in this case on October 3, 2005, and is in furtherance of said Notice of Appeal.

The fees required under § 41.20(b)(2) are dealt with in the accompanying TRANSMITTAL OF APPEAL BRIEF.

This brief contains items under the following headings as required by 37 C.F.R. § 41.37 and M.P.E.P. § 1206:

I.	Real Party In Interest
II	Related Appeals and Interferences
III.	Status of Claims
IV.	Status of Amendments
V.	Summary of Claimed Subject Matter
VI.	Grounds of Rejection to be Reviewed on Appeal

I. REAL PARTY IN INTEREST

The real party in interest for this appeal is:

Hewlett-Packard Development Company, L.P., a Texas Limited Partnership having its principal place of business in Houston, Texas.

II. RELATED APPEALS, INTERFERENCES, AND JUDICIAL PROCEEDINGS

There are no other appeals, interferences, or judicial proceedings which will directly affect or be directly affected by or have a bearing on the Board's decision in this appeal.

III. STATUS OF CLAIMS

A. Total Number of Claims in Application

There are 20 claims pending in application.

B. Current Status of Claims

1. Claims canceled: None
2. Claims withdrawn from consideration but not canceled: None
3. Claims pending: 1 - 20
4. Claims allowed: None
5. Claims rejected: 1 - 20

C. Claims On Appeal

The claims on appeal are claims 1 - 20

IV. STATUS OF AMENDMENTS

The present application was filed November 5, 2001. Responsive to a first Office Action, mailed February 9, 2005, Applicant submitted a Response on May 9, 2005, which did not amend any of the claims. A Final Office Action was then mailed July 7, 2005, from which the present appeal was taken. Thus, Applicant did not file an Amendment in response to the Final Office Action, but instead filed a Notice of Appeal which this brief supports. Accordingly, the claims on appeal are those rejected in the Final Office Action of July 7, 2005, a complete listing of which are provided in Appendix A.

V. SUMMARY OF CLAIMED SUBJECT MATTER

The following provides a concise explanation of the subject matter defined in each of the claims involved in the appeal, referring to the specification by page and line number and to the drawings by reference characters, as required by 37 C.F.R. § 41.37(c)(1)(v). Each element of the claims is identified by a corresponding reference to the specification and drawings where applicable. Note that the citation to passages in the specification and drawings for each claim element does not imply that the limitations from the specification and drawings should be read into the corresponding claim element.

According to one claimed embodiment, such as that of independent claim 1, a method of routing email messages to an appropriate one of a plurality of distributed email servers (e.g., email servers 110 and 112 of FIGURE 1) for handling by personnel assigned to such appropriate one (e.g., support personnel 114 and 116 of FIGURE 1) without requiring human intervention for the routing is provided (*see e.g.*, page 7, lines 1-6 of the specification). The method comprises receiving an email message at a first server (e.g., email server 110 or web server 102 of FIGURE 1, and *see* page 7, lines 6-7 of the specification), and executing software on the first server to autonomously determine characteristic information of a user (e.g., user 104 of FIGURE 1, and *see* page 7, lines 7-9 of the specification) having submitted information included in the email message. The method further comprises executing software on the first server to autonomously select an appropriate one of a plurality of distributed email servers for receipt of the email message based at least in part on the determined characteristic information of the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B; and *see* page 7, lines 9-12 of the specification), and executing software on the first server to autonomously route the email message to the selected email server (e.g.,

block 205 of FIGURE 2A, and block 224 of FIGURE 2B, and *see* page 7, lines 12-13 of the specification).

In certain embodiments, such as that of claim 2, the first server is a web server (e.g., web server 102 of FIGURE 1). In certain embodiments, such as that of claim 4, the first server is a default email server (e.g., email server 110 of FIGURE 1) to which email messages are sent from a web server (e.g., web server 102 of FIGURE 1).

In certain embodiments, such as that of claim 5, the method further comprises the user submitting information to a web server (e.g., block 201 of FIGURE 2A, and block 221 of FIGURE 2B), and the web server creating an email message to communicate the submitted information to the first server (e.g., block 202 of FIGURE 2A, and block 223 of FIGURE 2B, and *see* page 9, line 20 – page 10, line 22 of the specification).

In certain embodiments, such as that of claim 7, the characteristic information of the user includes identification of a geographical location of the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B). In certain embodiments, such as that of claim 8, the geographical location of the user identifies a country (*see e.g.,* page 14, line 27 – page 15, line 19 and page 24, line 24 – page 25, line 5 of the specification).

In certain embodiments, such as that of claim 9, executing software on the first server to autonomously select an appropriate email server further comprises selecting the appropriate email server based at least in part on the appropriate email server having a characteristic associated therewith that corresponds to the determined characteristic information of the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B, and *see* page 9, lines 1-19 of the specification).

In certain embodiments, such as that of claim 10, the characteristic information of the user includes identification of at least one language of the user, and the characteristic associated with the selected email server includes identification of the geographical location of the selected email server as a geographical location in which the language common therein corresponds to the at least one language of the user (*see e.g.*, page 10, lines 15-22 of the specification).

In certain embodiments, such as that of claim 12, the characteristic information of the user includes identification of a geographical location of the user, and the characteristic associated with the selected email server includes identification of the geographical location of the selected email server as a geographical location that corresponds to the geographical location of the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B, and *see* page 10, lines 15-22 of the specification).

In certain embodiments, such as that of claim 14, the characteristic information of the user includes information conveyed to a web server from the user (*see e.g.*, page 12, lines 3-12, and page 15, line 20 – page 16, line 2 of the specification).

According to another claimed embodiment, such as that of independent claim 15, a server for autonomously routing email messages received thereby to an appropriate one of a plurality of geographically distributed email servers (e.g., email servers 110 and 112 of FIGURE 1) for handling by personnel (e.g., personnel 114 and 116 of FIGURE 1) assigned to such appropriate one is provided. The server comprises communicative coupling to a communication network (e.g., network 106 and/or 108 of FIGURE 1) over which an email message is received, and memory storing computer executable software code. The server further comprises processor for executing the software code to autonomously determine characteristic information of a user having submitted information included in the email message received via the communicative coupling (*see e.g.*, page 9, line 1 – page 10, line 22 of the specification), for executing the software code to autonomously select an appropriate one of a plurality of distributed email servers for receipt of the email message based at least in part on the determined characteristic information of the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B, and *see* page 9, line 1 – page 10, line 22 of the specification), and for executing the software code to autonomously route the email message to the selected email server (e.g., block 205 of FIGURE 2A, and block 224 of FIGURE 2B, and *see* page 9, line 1 – page 10, line 22 of the specification).

In certain embodiments, such as that of claim 17, the selected email server is selected based at least in part on the selected email server having a characteristic associated therewith that corresponds to the determined characteristic information of the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B, and *see* page 9, lines 1-19 of the specification). And, in certain embodiments, such as that of claim 18, the characteristic information of the

user includes information identifying at least one language in which the user can communicate, and wherein the characteristic associated with the selected email server includes information identifying that the selected email server is located in a geographic location in which at least one of the at least one language in which the user can communicate is common to the geographic location (*see e.g.*, page 10, lines 15-22 of the specification).

According to another claimed embodiment, such as that of independent claim 19, a system comprises a plurality of distributed email servers (e.g., email servers 110 and 112 of FIGURE 1) of an entity communicatively coupled to a communication network (e.g., communication network 106 and/or 108 of FIGURE 1, and *see* page 7, lines 14-16 of the specification). The system further comprises a web server (e.g., web server 102 of FIGURE 1) communicatively accessible by at least one processor-based device (e.g., processor-based device 104 of FIGURE 1, and *see* page 7, lines 16-17 of the specification). The web server executes software thereon to present an interface for the entity to a user accessing the web server via the at least one processor-based device, wherein the interface enables the user to interact therewith to convey information to the entity (*see e.g.*, page 7, lines 17-20 of the specification). At least one of the web server and the plurality of geographically distributed email servers executes software to autonomously route information conveyed to the entity from the user as an email message to a selected one of the plurality of distributed email servers determined to be appropriate for handling of the email message (*see e.g.*, page 7, lines 20-23 of the specification).

In certain embodiments, such as that of claim 20, at least one of the web server and the plurality of distributed email servers is operable to autonomously select the selected one of the plurality of distributed email servers based at least in part on a characteristic associated with the selected email server corresponding to a characteristic identified for the user (e.g., block 204 of FIGURE 2A, and block 222 of FIGURE 2B, and *see* page 9, lines 1-19 of the specification).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Claim 11 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite; and

Claims 1-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,732,156 to Miloslavsky (hereinafter "*Miloslavsky*") in view of U.S. Patent No. 6,757,830 issued to Tarbotton et al. (hereinafter "*Tarbotton*").

VII. ARGUMENT

Appellant respectfully traverses the outstanding rejections of the pending claims, and requests that the Board reverse the outstanding rejections in light of the remarks contained herein. The claims do not stand or fall together. Instead, Appellant presents separate arguments for various independent and dependent claims. Each of these arguments is separately argued below and presented with separate headings and sub-heading as required by 37 C.F.R. § 41.37(c)(1)(vii).

I. Rejection Under 35 U.S.C. § 112, Second Paragraph

Claim 11 is rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Appellant respectfully submits that claim 11 is sufficiently definite to comply with 35 U.S.C. § 112, second paragraph, as discussed below.

In rejecting claim 11, the Office Action of February 9, 2005, asserts that claim 11 "contradicts with parent claim in that parent claim requires routing without human intervention", *see* page 2 of Office Action. Appellant fails to see any such contradiction in the language of claim 11. Claim 11 recites in part "wherein said characteristic information of said user includes identification of at least one language of said user". This language of claim 11 does not address routing of the email, but instead further recites what the characteristic information of the user may include. Therefore, it raises no contradiction with regard to the elements recited in claim 1. Claim 11 further recites "wherein said characteristic associated with the selected email server includes the selected email server having personnel assigned thereto that are capable of communicating in a language common to said at least one language of said user." This further language of claim 11 also does not

address routing of the email, but instead further recites what the characteristic associated with a selected email server may include. Nothing in the language of claim 11 is in contradiction with routing of an email without human intervention. Therefore, claim 11 raises no contradiction with regard to the elements recited in claim 1.

In maintaining this rejection of claim 11, the Final Office Action further asserts that it "is not seen how the first server would know in what language the user and the personnel are used in communication." Page 2 of the Final Office Action. Appellant respectfully submits that nothing further regarding how the first server would know in what language the user and personnel are communicating is required in order for claim 11 to be sufficiently definite in compliance with 35 U.S.C. § 112, second paragraph.

Independent claim 1 recites, in part:

> executing software on said first server to autonomously determine characteristic information of a user having submitted information included in said email message;
> executing software on said first server to autonomously select an appropriate one of a plurality of distributed email servers for receipt of said email message based at least in part on said determined characteristic information of said user

Thus, claim 1 clearly recites that software executes on the first server to autonomously determine characteristic information of a user. Claim 1 also clearly recites that software executes on the first server to autonomously select an appropriate one of a plurality of distributed email servers based at least in part on the determined characteristic information.

Claim 9 depends from claim 1 and further recites:

> wherein said executing software on said first server to autonomously select an appropriate email server further comprises:
> selecting said appropriate email server based at least in part on said appropriate email server having a characteristic associated therewith that corresponds to the determined characteristic information of said user.

Thus, claim 9 clearly recites that the software executing on the first server to autonomously select an appropriate email server does so based at least in part on the appropriate email server having a characteristic associated therewith that corresponds to the determined characteristic information of the user.

Claim 11 depends from claim 9 and further recites:

> wherein said characteristic information of said user includes identification of at least one language of said user, and wherein said characteristic associated with the selected email server includes the selected email server having personnel assigned thereto that are capable of communicating in a language common to said at least one language of said user.

Thus, claim 11 clearly recites that the characteristic information of the user includes identification of at least one language of the user. Claim 11 further clearly recites that the characteristic associated with the selected email server includes the selected email server having personnel assigned thereto that are capable of communicating in a language common to the at least one language of the user.

In view of the above, Applicant respectfully submits that claim 11 is sufficiently clear and nothing further is required to be included in the claim regarding how the first server would know in what language the user and the personnel use for communication. The claim language is not restricted as to how the first server may know such language, other than the recitation in claim 1 that software executes on the first server to autonomously determine the characteristic information of the user. Applicant respectfully notes that breadth of a claim is not equated with indefiniteness. Claim 11 complies with the requirements of 35 U.S.C. § 112, second paragraph in that the language of the claim is sufficiently clear. Nothing further is required for compliance with 35 U.S.C. § 112, second paragraph. Accordingly, withdrawal of this rejection is requested.

II. Rejections Under 35 U.S.C. § 103(a) over *Miloslavsky* in view of *Tarbotton*

Claims 1-20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Miloslavsky* in view of *Tarbotton*. Appellant respectfully traverses this rejection as provided further below.

To establish a prima facie case of obviousness, three basic criteria must be met. *See* M.P.E.P. § 2143. First, there must be some suggestion or motivation, either in the applied reference itself or in the knowledge generally available to one of ordinary skill in the art, to modify or combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the applied references must teach or suggest all the claim limitations.

Without conceding any other criteria, Appellant respectfully asserts that the rejection does not satisfy the first and third criteria. That is, the combination of *Miloslavksy* and *Tarbotton* fails to teach or suggest all the claim limitations, and no suggestion or motivation is found for modifying their teachings in the manner necessary for achieving the claim limitations.

Independent Claims 1 and 15 and Dependent Claims 3, 6, 11, 13, and 16

i. Applied Combination Fails to Teach or Suggest All Limitations

Independent claim 1 recites in part "receiving an email message at a first server; ... executing software on said first server to autonomously select an appropriate one of a plurality of distributed email servers for receipt of said email message based at least in part on said determined characteristic information of said user; and executing software on said first server to autonomously route said email message to the selected email server" (emphasis added). Similarly, independent claim 15 recites in part "processor for executing said software code to autonomously determine characteristic information of a user having submitted information included in said email message received via said communicative coupling, for executing said software code to autonomously select an appropriate one of a plurality of distributed email servers for receipt of said email message based at least in part on the determined characteristic information of said user, and for executing said software code to autonomously route said email message to the selected email server" (emphasis added). The combination of *Miloslavsky* and *Tarbotton* fails to teach or suggest these elements of claims 1 and 15, as discussed further below.

Miloslavsky does not teach or suggest a plurality of distributed email servers. Instead, *Miloslavsky* teaches an email processing center 100 that includes a single email server 102. Thus, *Miloslavsky* does not teach or suggest autonomously selecting an appropriate one of a plurality of distributed email servers for receipt of an email message, and *Miloslavsky* does not teach or suggest autonomously routing the email message to the selected email server. Rather, *Miloslavsky* teaches a system that addresses routing of an email to an appropriate one of a plurality of support personnel that are all coupled to a single email server (server 102 of FIG. 1 of *Miloslavsky*). Indeed, the technique of *Miloslavsky* could be applied in conjunction with embodiments of the present invention. For instance, once the email is routed to the appropriate email server (according to embodiments of the present invention) the technique

of *Miloslavsky* may be applied for routing the email received by the email server to a particular support person connected to the email server.

Miloslavsky is not concerned with a situation in which a plurality of distributed email servers exist, and *Miloslavsky* does not teach or suggest how an email is routed to one of a plurality of distributed email servers. Rather, *Miloslavsky* merely addresses how to route an email that is received at a particular email server to one of a plurality of support persons connected to such email server. In no instance does *Miloslavsky* suggest that based on a determined appropriate support person being located in a different location the email may be routed to a different email server.

The Office Action mailed February 9, 2005 concedes that *Miloslavsky* fails to teach or suggest a plurality of distributed e-mail servers, *see* page 3 of the February 9th Office Action. However, that Office Action asserted that *Tarbotton* teaches that all e-mail recipients require recipient mail servers in order to receive e-mails. Thus, that Office Action concluded that "If the support persons in *Miloslavsky* are located in different remote area, it would have been the obvious to a person of ordinary skill in the art to incorporate more e-mail servers as taught by *Tarbotton* because otherwise the support persons would not be able to receive e-mails." Page 4 of the February 9th Office Action. Appellant disagrees, as discussed further below.

Tarbotton does not teach or suggest that each e-mail recipient is required to have a separate e-mail server in order to receive e-mails. While FIG. 1 of *Tarbotton* shows a recipient email server 12 and a recipient 4 connected thereto, *Tarbotton* does not teach that a separate email server 12 need be implemented for each individual person, such as each support person in the system of *Miloslavsky*. Rather, as is well known in the art, many persons may be supported by a single email server. Indeed, the system of *Miloslavsky* is implemented such that multiple support persons are connected to a single email server. Nothing and *Tarbotton* precludes a plurality of persons being connected to e-mail server 12. Thus, *Tarbotton* does not teach or suggest that each e-mail recipient is required to have a separate e-mail server in order to receive e-mails. Thus, the combination of *Miloslavsky* and *Tarbotton* does not teach or suggest that separate email servers be implemented for separate support persons, but rather as specifically taught by *Miloslavsky* the support persons are all coupled to a single email server.

The Final Office Action mailed July 7, 2005 asserts that *Miloslavsky's* computers 122 and 124 meet the limitation of a plurality of distributed email servers, even without the teaching of the secondary reference *Tarbotton*. In view of this statement, it is unclear to what degree, if any, *Tarbotton* is being relied upon in the current § 103 rejection of claims 1 and 15. M.P.E.P. § 706.02(j) directs the Examiner to set forth in the Office Action: (1) the relevant teachings of the prior art relied upon; (2) the difference or differences in the claim over the applied references; (3) the proposed modification of the applied references necessary to arrive at the claimed subject matter; and (4) an explanation why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification. "Patent examiners carry the responsibility of making sure that the standard of patentability enunciated by the Supreme Court and by the Congress is applied in each and every case." M.P.E.P. § 2141 (emphasis in original). Further, "[o]ffice policy is to follow *Graham v. John Deere Co.* in the consideration and determination of obviousness under 35 U.S.C. 103." M.P.E.P. § 2141.

The Final Office Action fails to satisfy the above requirements for making a proper § 103 rejection as the Final Office Action appears to reject claims 1 and 15 based upon a combination of *Miloslavsky* and *Tarbotton* but further asserts that *Miloslavsky* teaches all elements of these claims even without the teaching of *Tarbotton*. As such, the Final Office Action fails to set forth at least set the difference or differences in the claim over the applied references; the proposed modification of the applied references necessary to arrive at the claimed subject matter; and an explanation why one of ordinary skill in the art at the time the invention was made would have been motivated to make the proposed modification.

In addition, contrary to the Final Office Action's assertion, the computers 122 and 124 of *Miloslavsky* are not a plurality of distributed email servers. As the Office Action of February 9, 2005 correctly noted (on page 3 thereof):

> Miloslavsky only show one recipient mail server (102 of Figure 1). That is because all the support persons in Miloslavsky are located in one processing center (100 of figure 1 and lines 21-23 column 5).

Only one email server, i.e. email server 102 of Figure 1, is contemplated in the email processing center 100 of *Miloslavsky*. As discussed further below, computers 122 and 124 are not described as email servers in *Miloslavsky*, but are instead taught to be clients of email

server 102. That is, email received at email processing center 100 via data network 104 is stored to email server 102, and router 116 then selectively routes the email messages to appropriate ones of the client terminals 122 and 124 for handling by a respective user logged on to such terminal. In reading computers 122 and 124 as email servers, the Final Office Action goes against the express teaching of *Miloslavsky*, which clearly provides a single email server 102 with computers 122 and 124 acting as clients of such email server 102. The Examiner correctly recognized in the February 9th Office Action that *Miloslavsky* teaches only one email server. Appellant respectfully submits that this initial reading of *Miloslavsky* by the Examiner evidences that one of ordinary skill in the art would not read *Miloslavsky* as teaching a plurality of distributed email servers.

Miloslavsky provides at column 1, lines 23-34:

> In the simplest case, electronic mail is the delivery of text-based messages from a sending computer to one or more recipient computers. The sending and recipient computers are connected to a data network. Typically, the message is temporarily stored in a server of the data network. The recipient computers (users) can retrieve the stored messages at their convenience.

Thus, *Miloslavsky* recognizes that a received email message may be stored to a server, and then retrieved from the server by client computers. *Miloslavsky* further provides at column 2, lines 24-39:

> The present invention involves a system for routing an e-mail to one of a plurality of support persons in a processing center. Each support person has a skill set that is suitable for responding to a certain type of e-mails. Thus, it is more efficient to route the e-mail to an available person who is best qualified to answer the mail. The system comprises an e-mail server for receiving the e-mail from a sender, an information extractor for extracting relevant information from the e-mail, and a router for routing the e-mail. In one embodiment of the invention, the system contains a database for storing information related to all persons who can answer e-mails. The system also comprises a statistic server (also called stat-server) for storing the history of all activities in the system. The router can make routing decisions based on the information stored in the database and the stat-server.

Thus, *Miloslavsky* provides a single email server (i.e., server 102 of Figure 1), and addresses routing of emails from such server to client computers. As discussed further below, *Miloslavsky* teaches routing the emails from the email server 102 to a client computer based on the user logged onto the client computer. Thus, *Miloslavsky* is not concerned with

routing of an email message to an appropriate one of a plurality of email servers, but instead addresses how, once an email message is received at an email server, to route the email message to one of a plurality of different clients of the email server. For instance, *Miloslavsky* explains at column 3, lines 26-35:

> One aspect of the present invention is a system for automatically routing the e-mails to the most qualified and available support persons. For example, a support person may be an expert in one product of ABC. All e-mails related to this product will be routed to this person automatically. Further, the system can distribute the load so that every support person receives approximately the same number of emails. As a result, the problems of the prior art systems can be solved.

Miloslavsky clearly teaches that computers 122 and 124 are clients of an email server 102, and does not teach that computers 122 and 124 are themselves email servers. For instance, at column 5, lines 21-32 *Miloslavsky* provides:

> Processing center 100 contains a number of computer terminals, such as computers 122 and 124, managed by support persons. When a support person starts 15 to work, he/she logs in so that stat-server 112 knows who is working in center 100 and how to reach the support person. Router 116 obtains information to make selection decisions from stat-server 112 and database 114. Once a decision is made, router 116 sends a command to email server 102 to route the e-mail to the selected computer terminal. The support person responds to the e-mail and sends the reply to e-mail server 102, which delivers the reply to the sender via data network 104. (Emphasis added).

Thus, computers 122 and 124 are expressly taught by *Miloslavsky* as being clients of a single email server 102. *Miloslavsky* provides no teaching or suggestion that computers 122 and 124 are email servers, and indeed *Miloslavsky* provides no teaching of any clients that use such computers 122 and 124 as email servers. Instead, computers 122 and 124 are merely clients of email server 102.

In view of the above, neither *Miloslavsky* alone, nor the combination of *Miloslavsky* and *Tarbotton* teaches or suggests all elements of claims 1 and 15, and therefore Appellant respectfully requests that the rejection of claims 1 and 15 under 35 U.S.C. § 103(a) be overturned.

ii. No Motivation to Modify the Combination for Achieving the Claim Limitations

As discussed above, the February 9th Office Action conceded that *Miloslavsky* does not teach a plurality of distributed e-mail servers. However, the February 9th Office Action appears to assert that it would have been obvious to implement separate e-mail servers for each of the support personnel. For instance, the February 9th Office Action contends "If the support persons in *Miloslavsky* are located in different remote area, it would have been the obvious to a person of ordinary skill in the art to incorporate more e-mail servers as taught by *Tarbotton* because otherwise the support persons would not be able to receive e-mails" (emphasis added). Page 4 of the Office Action. Appellant disagrees, as discussed below.

As discussed above, *Tarbotton* does not require separate e-mail servers for each recipient. Further, merely because support persons may be located in different remote areas does not require separate e-mail servers for those persons to be able to receive e-mails. For instance, support persons could access an e-mail server from a remote location for retrieving e-mails from such e-mail server. Thus, even if the support persons in *Miloslavsky* were located remote from e-mail server 102, such support persons could still access e-mail server 102 via communication network 128. Accordingly, the motivation recited in the February 9th Office Action is improper because separate e-mail servers would not be required for support personnel to be able to receive e-mails even if the support personnel were located in different remote areas.

It is well settled that the fact that references can be combined or modified is not sufficient to establish a prima facie case of obviousness, *see* M.P.E.P. § 2143.01. Additionally, the prior art must suggest the desirability of the claimed invention, *see* M.P.E.P. § 2143.01. "There must be some reason, suggestion, or motivation found in the prior art whereby a person of ordinary skill in the field of the invention would make the combination" and "[t]hat knowledge can not come from the applicant's invention itself." *In re Oetiker*, 977 F.2d 1443, 1447, 24 U.S.P.Q.2d 1443, 1446 (Fed. Cir. 1992). Further, it is insufficient to prove that at the time of the claimed invention, the separate elements of the device were present in the known art. Rather, there must have been some explicit teaching or suggestion in the art to motivate one of even ordinary skill to combine such elements so as to create the same invention. *See Arkie Lures, Inc. v. Gene Larew Tackle, Inc.*, 119 F.3d 953, 957, 43 U.S.P.Q.2d 1294 (Fed. Cir. 1997).

As discussed above, no proper motivation for modifying the applied references to achieve the claim elements, particularly a plurality of distributed email servers, has been provided by the February 9th Office Action. Therefore, the rejection under 35 U.S.C. § 103(a) should be overturned.

Additionally, it is not clear if/how a plurality of distributed email servers could be implemented in *Miloslavsky* without changing its principle of operation. For instance, *Miloslavsky* teaches that processing center 100 includes email server 102 for receiving emails sent to an address associated with it, such as support@abc-company.com, *see* col. 3, lines 7-14 of *Miloslavsky*. *Miloslavsky* further teaches at column 5, lines 21-32:

> Processing center 100 contains a number of computer terminals, such as computers 122 and 124, managed by support persons. When a support person starts 15 to work, he/she logs in so that stat-server 112 knows who is working in center 100 and how to reach the support person. Router 116 obtains information to make selection decisions from stat-server 112 and database 114. Once a decision is made, router 116 sends a command to email server 102 to route the e-mail to the selected computer terminal. The support person responds to the e-mail and sends the reply to e-mail server 102, which delivers the reply to the sender via data network 104.

In view of the above, email server 102 receives emails and is coupled with stat-server 112 and router 116 to determine which of the support persons that are logged on each email received by the email server 102 is to be directed. It is unclear if/how such a system could be implemented with separate email servers implemented for each support person. For instance, would the email servers merely be duplicative for storing the same emails, and if so then why would such separate email servers be desired? Further, it is unclear how the stat-server and router would interact with the various email servers if more than one were implemented. "If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims prima facie obvious." *See* M.P.E.P. § 2143.01, citing *In re Ratti*, 123 U.S.P.Q. 349 (CCPA 1959). As described above, it is unclear how a plurality of email servers could be implemented in *Miloslavsky* without changing the inter-operation of the stat-server, router and various other components of *Miloslavsky's* system.

In response to the above arguments, the Final Office Action does not address the lack of motivation for combining *Tarbotton* with *Miloslavsky*, but instead asserts that

"Miloslavsky's computers 122 and 124 meet the limitation of 'a plurality of distributed email servers' even without the teaching of the secondary reference Tarbotton." Page 3 of the Final Office Action.

In view of the above, claims 1 and 15 are not obvious under 35 U.S.C. § 103(a) because proper motivation for combining/modifying the references has not been provided. Accordingly, Appellant respectfully requests that the rejection of claims 1 and 15 be overturned.

Dependent claims 3, 6, 11, 13, and 16 each depend either directly or indirectly from one of independent claims 1 and 15, and thus inherit all limitations of the respective independent claim from which they depend. It is respectfully submitted that dependent claims 3, 6, 11, 13, and 16 are allowable at least because of their dependency from their respective independent claims for the reasons discussed above, but also in view of their novel claim features.

Dependent Claim 2

Dependent claim 2 depends from independent claim 1, and thus inherits all limitations of independent claim 1. It is respectfully submitted that dependent claim 2 is allowable at least because of its dependency from independent claim 1 for the reasons discussed above.

Moreover, dependent claim 2 further recites "wherein said first server is a web server". Neither *Miloslavsky* nor *Tarbotton* teach or suggest this further limitation of claim 2. The February 9th Office Action merely asserts, regarding claim 2, that "label of servers is not a patentable subject matter." Page 4 of Office Action. The Final Office Action does not further address claim 2. Appellant respectfully submits that the language of claim 2 is not a mere "label" of a server, but identifies that the recited "first server" of claim 1 is a "web server", which is a well-known type of server. Again, neither *Miloslavsky* nor *Tarbotton* address a situation in which the first server recited in claim 1 is a web server. Accordingly, the rejection of claim 2 should be overturned.

Dependent Claim 4

Dependent claim 4 depends indirectly from independent claim 1, and thus inherits all limitations of independent claim 1. It is respectfully submitted that dependent claim 4 is allowable at least because of its dependency from independent claim 1 for the reasons discussed above.

Moreover, dependent claim 4 further recites "wherein said first server is a default email server to which email messages are sent from a web server". Neither *Miloslavsky* nor *Tarbotton* teach or suggest this further limitation of claim 4. The February 9th Office Action merely asserts, regarding claim 4, that "label of servers is not a patentable subject matter." Page 4 of Office Action. The Final Office Action does not further address claim 4. Appellant respectfully submits that the language of claim 4 is not a mere "label" of a server, but identifies that the recited "first server" of claim 1 is a default email server to which email messages are sent from a web server. Again, neither *Miloslavsky* nor *Tarbotton* address a situation in which the first server recited in claim 1 is a default email server to which email messages are sent from a web server. Indeed, neither of these references mentions sending email messages from a web server to an email server. Accordingly, the rejection of claim 4 should be overturned.

Dependent Claim 5

Dependent claim 5 depends from independent claim 1, and thus inherits all limitations of independent claim 1. It is respectfully submitted that dependent claim 5 is allowable at least because of its dependency from independent claim 1 for the reasons discussed above.

Moreover, dependent claim 5 further recites "said user submitting information to a web server; and said web server creating an email message to communicate the submitted information to said first server". In its treatment of claim 5, the February 9th Office Action merely asserts that "state-server 112 in Miloslavsky also stores user information." Page 4 of Office Action. The Final Office Action does not further address claim 5.

It is noted that claim 5 does not recite storing user information, and thus whether stat-server 112 stores user information seems irrelevant to the consideration of patentability of claim 5. Neither *Miloslavsky* nor *Tarbotton* teach or suggest the elements that are recited by

claim 5. For instance, neither *Miloslavsky* nor *Tarbotton* teach or suggest a user submitting information to a web server and a web server creating an email message to communicate the submitted information.

In view of the above, claim 5 is not obvious under 35 U.S.C. § 103(a) over *Miloslavsky* and *Tarbotton* as this combination fails to teach or suggest all elements of claim 5. Therefore, Appellant respectfully requests that the rejection of claim 5 be overturned.

Dependent Claim 7

Dependent claim 7 depends from independent claim 1, and thus inherits all limitations of independent claim 1. It is respectfully submitted that dependent claim 7 is allowable at least because of its dependency from independent claim 1 for the reasons discussed above.

Moreover, dependent claim 7 further recites "wherein said characteristic information of said user includes identification of a geographical location of said user." Nothing in *Miloslavsky* or *Tarbotton* teaches or suggests this further element of claim 7. That is, neither of the applied references teach or suggest determining characteristic information of a user who submits information included in an email message, wherein the characteristic information includes identification of a geographical location of the user.

Accordingly, Appellant respectfully requests that the rejection of claim 7 be overturned.

Dependent Claim 8

Dependent claim 8 depends from claim 7, which depends from independent claim 1, and thus claim 8 inherits all limitations of claims 1 and 7. It is respectfully submitted that dependent claim 8 is allowable at least because of its dependency from claims 1 and 7 for the reasons discussed above.

Moreover, dependent claim 8 further recites "wherein said identification of a geographical location of said user identifies a country." Nothing in *Miloslavsky* or *Tarbotton* teaches or suggests this further element of claim 8. That is, neither of the applied references teach or suggest determining characteristic information of a user who submits information

included in an email message, wherein the characteristic information includes identification of a country of the user.

Accordingly, Appellant respectfully requests that the rejection of claim 8 be overturned.

Dependent Claim 9

Dependent claim 9 depends from independent claim 1, and thus inherits all limitations of independent claim 1. It is respectfully submitted that dependent claim 9 is allowable at least because of its dependency from independent claim 1 for the reasons discussed above.

Moreover, dependent claim 9 further recites "wherein said executing software on said server to autonomously select an appropriate email server further comprises: selecting said appropriate email server based at least in part on said appropriate email server having a characteristic associated therewith that corresponds to the determined characteristic information of the user." As described above, *Miloslavsky* does not teach or suggest selecting an appropriate email server, but instead teaches a single email server and selects one of a plurality of support personnel that are connected to the email server to whom an email received by the email server should be routed. Further, even if separate email servers were implemented for each support person, as suggested by the February 9th Office Action, nothing in *Miloslavsky* teaches or suggests selecting an appropriate one of such email servers based on such email server having a characteristic associated therewith that corresponds to a determined characteristic information of a user, as recited in claim 9.

Tarbotton also fails to cure the above deficiency of *Miloslavsky*.

Accordingly, Appellant respectfully requests that the rejection of claim 9 be overturned.

Dependent Claim 10

Dependent claim 10 depends from claim 9, which depends from independent claim 1, and thus claim 10 inherits all limitations of claims 1 and 9. It is respectfully submitted that

dependent claim 10 is allowable at least because of its dependency from claims 1 and 9 for the reasons discussed above.

Moreover, dependent claim 10 further recites "wherein said characteristic information of said user includes identification of at least one language of said user, and wherein said characteristic associated with the selected email server includes identification of the geographical location of the selected email server as a geographical location in which the language common therein corresponds to the at least one language of said user" (emphasis added). As described above, *Miloslavsky* does not teach or suggest selecting an appropriate email server, but instead teaches a single email server and selects one of a plurality of support personnel that are connected to the email server to whom an email received by the email server should be routed. Further, even if separate email servers were implemented for each support person, as suggested by the February 9th Office Action, nothing in *Miloslavsky* teaches or suggests selecting an appropriate one of such email servers based on such email server having a geographical location in which the language common therein corresponds to the at least one language of the user, as recited in claim 10.

Tarbotton also fails to cure the above deficiency of *Miloslavsky*.

Accordingly, Appellant respectfully requests that the rejection of claim 10 be overturned.

Dependent Claim 12

Dependent claim 12 depends from claim 9, which depends from independent claim 1, and thus claim 12 inherits all limitations of claims 1 and 9. It is respectfully submitted that dependent claim 12 is allowable at least because of its dependency from claims 1 and 9 for the reasons discussed above.

Moreover, dependent claim 12 further recites "wherein said characteristic information of said user includes identification of a geographical location of said user, and wherein said characteristic associated with the selected email server includes identification of the geographical location of the selected email server as a geographical location that corresponds to the geographical location of said user." (emphasis added). As described above, *Miloslavsky* does not teach or suggest selecting an appropriate email server, but instead

teaches a single email server and selects one of a plurality of support personnel that are connected to the email server to whom an email received by the email server should be routed. Further, even if separate email servers were implemented for each support person, as suggested by the February 9th Office Action, nothing in *Miloslavsky* teaches or suggests selecting an appropriate one of such email servers based on such email server having a geographical location that corresponds to the geographical location of the user, as recited in claim 12.

Tarbotton also fails to cure the above deficiency of *Miloslavsky*.

Accordingly, Appellant respectfully requests that the rejection of claim 12 be overturned.

Dependent Claim 14

Dependent claim 14 depends from independent claim 1, and thus inherits all limitations of independent claim 1. It is respectfully submitted that dependent claim 14 is allowable at least because of its dependency from independent claim 1 for the reasons discussed above.

Moreover, dependent claim 14 further recites "wherein said characteristic information of said user includes information conveyed to a web server from said user." Neither *Miloslavsky* nor *Tarbotton* teach or suggest this further element of claim 14. For instance, neither *Miloslavsky* nor *Tarbotton* teaches or suggests a user conveying information to a web server, and thus neither reference teaches or suggests characteristic information that includes such information conveyed to a web server from a user.

In view of the above, claim 14 is not obvious under 35 U.S.C. § 103(a) over *Miloslavsky* and *Tarbotton* as this combination fails to teach or suggest all elements of claim 14. Therefore, Appellant respectfully requests that the rejection of claim 14 be overturned.

Dependent Claim 17

Dependent claim 17 depends from independent claim 15, and thus inherits all limitations of independent claim 15. It is respectfully submitted that dependent claim 17 is

allowable at least because of its dependency from independent claim 15 for the reasons discussed above.

Moreover, dependent claim 17 further recites "wherein said selected email server is selected based at least in part on said selected email server having a characteristic associated therewith that corresponds to the determined characteristic information of said user." (emphasis added). As described above, *Miloslavsky* does not teach or suggest selecting an appropriate email server, but instead teaches a single email server and selects one of a plurality of support personnel that are connected to the email server to whom an email received by the email server should be routed.

Tarbotton also fails to cure the above deficiency of *Miloslavsky*.

Accordingly, Appellant respectfully requests that the rejection of claim 17 be overturned.

Dependent Claim 18

Dependent claim 18 depends from claim 17, which depends from independent claim 15, and thus claim 18 inherits all limitations of claims 15 and 17. It is respectfully submitted that dependent claim 18 is allowable at least because of its dependency from claims 15 and 17 for the reasons discussed above.

Moreover, dependent claim 18 further recites "wherein said characteristic information of said user includes information identifying at least one language in which said user can communicate, and wherein said characteristic associated with the selected email server includes information identifying that the selected email server is located in a geographic location in which at least one of said at least one language in which said user can communicate is common to said geographic location" (emphasis added). As described above, *Miloslavsky* does not teach or suggest selecting an appropriate email server, but instead teaches a single email server and selects one of a plurality of support personnel that are connected to the email server to whom an email received by the email server should be routed. Further, even if separate email servers were implemented for each support person, as suggested by the February 9th Office Action, nothing in *Miloslavsky* teaches or suggests selecting an appropriate one of such email servers based on such email server having a

geographical location in which at least one language in which the user can communicate is common to the geographic location, as recited in claim 18.

Tarbotton also fails to cure the above deficiency of *Miloslavsky*.

Accordingly, Appellant respectfully requests that the rejection of claim 18 be overturned.

Independent Claim 19

i. Applied Combination Fails to Teach or Suggest All Limitations

Independent claim 19 recites:

> plurality of distributed email servers of an entity communicatively coupled to a communication network;
>
> web server communicatively accessible by at least one processor-based device, said web server executing software thereon to present an interface for said entity to a user accessing said web server via said at least one processor-based device, wherein said interface enables said user to interact therewith to convey information to said entity; and
>
> at least one of said web server and said plurality of geographically distributed email servers executing software to autonomously route information conveyed to said entity from said user as an email message to a selected one of said plurality of distributed email servers determined to be appropriate for handling of said email message" (emphasis added).

The combination of *Miloslavsky* and *Tarbotton* fails to teach or suggest these elements of claim 19, as discussed further below.

As described above with claims 1 and 15, *Miloslavsky* does not teach or suggest a plurality of distributed email servers. Instead, *Miloslavsky* teaches an email processing center 100 that includes a single email server 102. Thus, contrary to the assertion in the Final Office Action, *Miloslavsky* does not teach or suggest a plurality of distributed email servers. Additionally, *Tarbotton* does not teach or suggest that each e-mail recipient is required to have a separate e-mail server in order to receive e-mails. While Figure 1 of *Tarbotton* shows a recipient email server 12 and a recipient 4 connected thereto, *Tarbotton* does not teach that a separate email server 12 need be implemented for each individual person, such as each support person in the system of *Miloslavsky*. Thus, contrary to the assertion of the February

9th Office Action, the combination of *Miloslavsky* and *Tarbotton* does not teach or suggest implementing a recipient email server for each support person in the system of *Miloslavsky*. Thus, neither *Miloslavsky* alone, nor the combination of *Miloslavsky* and *Tarbotton* teaches or suggests all elements of independent claim 19, and therefore the rejection of claim 19 under 35 U.S.C. § 103(a) should be overturned.

Further, neither *Miloslavsky* nor *Tarbotton* teach or suggest a web server executing software thereon to present an interface to a user that enables the user to interact therewith to convey information to the entity. Also, neither *Miloslavsky* nor *Tarbotton* teach or suggest routing information conveyed to the entity from a user (via a web server's interface) as an email message to an email server. That is, neither *Miloslavsky* nor *Tarbotton* teach or suggest a system in which a user interacts with a web server to supply information, wherein such information is conveyed as an email to an appropriate email server. Rather, in *Miloslavsky* and *Tarbotton* a sender composes an email and directs it to an intended recipient email addresses without interacting with a web server's interface. Indeed, in response to these arguments, the Final Office Action fails to identify any teaching in *Miloslavsky* or *Tarbotton* of a system in which a user interacts with a web server to supply information, wherein such information is conveyed as an email to an appropriate email server. Thus, the combination of *Miloslavsky* and *Tarbotton* does not teach or suggest these further elements of independent claim 19.

In view of the above, independent claim 19 is not obvious under 35 U.S.C. § 103(a) over *Miloslavsky* alone or the combination of *Miloslavsky* and *Tarbotton*. Accordingly, Appellant respectfully requests that the rejection of claim 19 be overturned.

ii. No Motivation to Modify the Combination for Achieving the Claim Limitations

As discussed above with claims 1 and 15 proper motivation for combining/modifying the *Miloslavsky* and *Tarbotton* references has not been provided. Accordingly, a proper rejection under 35 U.S.C. § 103 has not been established, and thus for this further reason, the rejection of independent claim 19 should be overturned.

Dependent Claim 20

Dependent claim 20 depends from independent claim 19, and thus inherits all limitations of independent claim 19. It is respectfully submitted that dependent claim 20 is allowable at least because of its dependency from independent claim 19 for the reasons discussed above.

Moreover, dependent claim 20 further recites "wherein at least one of said web server and said plurality of distributed email servers is operable to autonomously select said selected one of said plurality of distributed email servers based at least in part on a characteristic associated with the selected email server corresponding to a characteristic identified for said user." As described above, *Miloslavsky* does not teach or suggest selecting an appropriate email server, but instead teaches a single email server and selects one of a plurality of support personnel that are connected to the email server to whom an email received by the email server should be routed.

Tarbotton also fails to cure the above deficiency of *Miloslavsky*.

Accordingly, Appellant respectfully requests that the rejection of claim 20 be overturned.

VIII. CLAIMS

A copy of the claims involved in the present appeal is attached hereto as Appendix A. As indicated above, the claims in Appendix A do include the amendments filed by Applicant on May 9, 2005.

IX. EVIDENCE

As noted in Appendix B hereto, no evidence pursuant to §§ 1.130, 1.131, or 1.132 or entered by or relied upon by the examiner is being submitted.

X. RELATED PROCEEDINGS

As noted in Appendix C hereto, no related proceedings are referenced in II. above, and thus no copies of decisions in any such related proceedings are provided.

I hereby certify that this correspondence is being deposited with the United States Postal Service as Express Mail, Label No. EV 482725795US in an envelope addressed to: M/S Appeal Brief - Patents, Commissioner for Patents, Alexandria, VA 22313.

Date of Deposit: December 1, 2005

Typed Name: Gail L. Miller

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Respectfully submitted,

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APPENDIX A

Claims Involved in the Appeal of Application Serial No. 09/993,277

1. A method of routing email messages to an appropriate one of a plurality of distributed email servers for handling by personnel assigned to such appropriate one without requiring human intervention for said routing, the method comprising:

receiving an email message at a first server;

executing software on said first server to autonomously determine characteristic information of a user having submitted information included in said email message;

executing software on said first server to autonomously select an appropriate one of a plurality of distributed email servers for receipt of said email message based at least in part on said determined characteristic information of said user; and

executing software on said first server to autonomously route said email message to the selected email server.

2. The method of claim 1 wherein said first server is a web server.

3. The method of claim 1 wherein said first server is an email server.

4. The method of claim 3 wherein said first server is a default email server to which email messages are sent from a web server.

5. The method of claim 1 further comprising:

said user submitting information to a web server; and

said web server creating an email message to communicate the submitted information to said first server.

6. The method of claim 1 wherein said characteristic information of said user includes identification of at least one language of said user.

7. The method of claim 1 wherein said characteristic information of said user includes identification of a geographical location of said user.

8. The method of claim 7 wherein said identification of a geographical location of said user identifies a country.

9. The method of claim 1 wherein said executing software on said first server to autonomously select an appropriate email server further comprises:

selecting said appropriate email server based at least in part on said appropriate email server having a characteristic associated therewith that corresponds to the determined characteristic information of said user.

10. The method of claim 9 wherein said characteristic information of said user includes identification of at least one language of said user, and wherein said characteristic associated with the selected email server includes identification of the geographical location of the selected email server as a geographical location in which the language common therein corresponds to the at least one language of said user.

11. The method of claim 9 wherein said characteristic information of said user includes identification of at least one language of said user, and wherein said characteristic associated with the selected email server includes the selected email server having personnel assigned thereto that are capable of communicating in a language common to said at least one language of said user.

12. The method of claim 9 wherein said characteristic information of said user includes identification of a geographical location of said user, and wherein said characteristic associated with the selected email server includes identification of the geographical location of the selected email server as a geographical location that corresponds to the geographical location of said user.

13. The method of claim 1 wherein said characteristic information of said user includes information available from a database.

14. The method of claim 1 wherein said characteristic information of said user includes information conveyed to a web server from said user.

15. A server for autonomously routing email messages received thereby to an appropriate one of a plurality of geographically distributed email servers for handling by personnel assigned to such appropriate one, the server comprising:

communicative coupling to a communication network over which an email message is received;

memory storing computer executable software code;

processor for executing said software code to autonomously determine characteristic information of a user having submitted information included in said email message received via said communicative coupling, for executing said software code to autonomously select an appropriate one of a plurality of distributed email servers for receipt of said email message based at least in part on the determined characteristic information of said user, and for executing said software code to autonomously route said email message to the selected email server.

16. The server of claim 15 wherein said communication network is selected from the group consisting of:

the Internet, an Intranet, an Extranet, a local area network (LAN), a wide area network (WAN), public switched telephone network (PSTN), wireless network, modem to modem connection, and any combination thereof.

17. The server of claim 15 wherein said selected email server is selected based at least in part on said selected email server having a characteristic associated therewith that corresponds to the determined characteristic information of said user.

18. The server of claim 17 wherein said characteristic information of said user includes information identifying at least one language in which said user can communicate, and wherein said characteristic associated with the selected email server includes information identifying that the selected email server is located in a geographic location in which at least one of said at least one language in which said user can communicate is common to said geographic location.

19. A system comprising:

plurality of distributed email servers of an entity communicatively coupled to a communication network;

web server communicatively accessible by at least one processor-based device, said web server executing software thereon to present an interface for said entity to a user accessing said web server via said at least one processor-based device, wherein said interface enables said user to interact therewith to convey information to said entity; and

at least one of said web server and said plurality of geographically distributed email servers executing software to autonomously route information conveyed to said entity from said user as an email message to a selected one of said plurality of distributed email servers determined to be appropriate for handling of said email message.

20. The system of claim 19 wherein at least one of said web server and said plurality of distributed email servers is operable to autonomously select said selected one of said plurality of distributed email servers based at least in part on a characteristic associated with the selected email server corresponding to a characteristic identified for said user.

APPENDIX B

Evidence

None.

APPENDIX C

Related Proceedings

None.